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*Attorneys for Sonos, Inc.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA,  
SAN FRANCISCO DIVISION

SONOS, INC.,  
Plaintiff and Counter-defendant,  
v.  
GOOGLE LLC,  
Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA  
Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF CLEMENT  
ROBERTS IN SUPPORT OF SONOS,  
INC.'S ADMINISTRATIVE MOTION  
TO FILE UNDER SEAL RE SONOS'S  
MOTION *IN LIMINE* NO. 1**

1 I, Clement Roberts, declare as follows and would so testify under oath if called upon to do  
2 so:

3 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel  
4 of record to Sonos, Inc. (“Sonos”) in the above-captioned matter. I am a member in good  
5 standing of the Bar of the State of California. I make this declaration based on my personal  
6 knowledge, unless otherwise noted. If called, I can and will testify competently to the matters set  
7 forth herein.

8 2. I make this declaration in support of Sonos’s Administrative Motion to File Under  
9 Seal in connection with Sonos’s Motion *in Limine* No. 1 (“Sonos’s Motion”) and Google’s  
10 Response to Motion *in Limine* No. 1 (“Google’s Response”).

11 3. Sonos seeks an order sealing the materials as listed below:

DOCUMENT	PORTIONS TO BE SEALED	DESIGNATING PARTY
Exhibit A to Kolker Declaration	Portions highlighted in blue	Sonos
Exhibit B to Kolker Declaration	Portions highlighted in blue	Sonos
Google’s Response	Portions highlighted in blue	Sonos
Google’s Response	Portions highlighted in green	Sonos and Google
Exhibit 1 to Cooper Declaration	Entire Document	Sonos
Exhibit 2 to Cooper Declaration	Portions highlighted in blue	Sonos
Exhibit 3 to Cooper Declaration	Portions highlighted in blue	Sonos

21 4. The portions of Google’s Response highlighted in blue and green, and the exhibits  
22 listed above (including the blue highlighted portions of Exhibits A and B to the Kolker  
23 Declaration, the blue highlighted portions of Exhibits 2 and 3 to the Cooper Declaration, and all  
24 of Exhibit 1 to the Cooper Declaration), contain references to Sonos’s confidential business  
25 information and trade secrets, including the details of Sonos’s confidential licenses and license  
26 offers with third parties, including Google. Sonos’s licensing practices, history, and previous  
27 license agreements are all confidential information that Sonos does not share publicly. Thus,  
28 public disclosure of such information may lead to competitive harm as Sonos’s competitors could

1 use these details to gain a competitive advantage in the marketplace. A less restrictive alternative  
2 than sealing the portions of Sonos's Motion and the exhibits indicated in the table above, would  
3 not be sufficient because the information sought to be sealed is Sonos's confidential business  
4 information and trade secrets and is integral to Sonos's legal arguments (in the case of Exhibits A  
5 and B to the Kolker Declaration) or cited by Google (in the case of Google's Response and  
6 Exhibits 1, 2, and 3 to the Cooper Declaration).

7  
8 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
9 knowledge. Executed this 25th day of April, 2023 in Belevedere, California.

10  
11 /s/ Clement S. Roberts  
12 Clement Seth Roberts  
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